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Attorneys for Plaintiffs McDavid

Knee Guard, Inc. and Stirling

Mouldings Limited

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MCDavid KNEE GUARD, INC.,

an Illinois corporation, and

STIRLING MOULDINGS LIMITED,

an English corporation,

Plaintiffs,

v.

NIKE USA, INC., an Oregon corporation,

Defendant.

CASE NO: _____

**PLAINTIFFS' MOTION TO COMPEL
DANIEL KIM TO PRODUCE
DOCUMENTS AND APPEAR FOR A
DEPOSITION**

**Fed. R. Civ. P. 37, 45
Oral Argument Requested**

LOCAL RULE 7.1(a) CERTIFICATION STATEMENT

Pursuant to Local Rule 7.1(a), counsel for plaintiffs McDavid Knee Guard, Inc.

("McDavid") and Stirling Mouldings Limited ("Stirling") certifies that counsel for plaintiffs has

conferred by telephone with Daniel Kim's counsel and no resolution was reached. The assistance of the Oregon Court is required.

MOTION

Plaintiffs move this Court for an Order requiring Daniel Kim, President and Owner of Finn Tech, Inc., an Oregon Corporation, Finn Tech Taiwan, located in Taiwan, Finn Tech Holdings, Limited, located in Hong Kong, and Finn Tech Co., Limited, a Korean corporation (collectively "Finn Tech"), to produce the documents in his custody, possession, or control, including documents in the custody, possession, or control of his business entities, and to appear for a deposition as requested in the subpoenas served upon him at his residence in Portland and upon him personally.

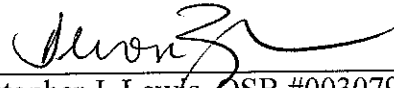
This motion is supported by the memorandum, Declaration of Devon Zastrow Newman and the exhibits submitted herewith.

Dated this 19th day of June, 2009.

Respectfully submitted,

Schwabe, Williamson & Wyatt, P.C.

By:



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CERTIFICATE OF SERVICE

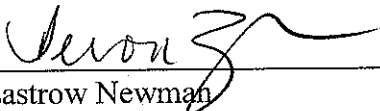
I hereby certify that on the 19th day of June, 2009, I served the foregoing PLAINTIFFS' MOTION TO COMPEL DANIEL KIM TO PRODUCE DOCUMENTS AND APPEAR FOR A DEPOSITION on the following persons:

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